

REMARKS

Claims 1-23 remain pending in the application, with claims 24-39 having been previously canceled.

Claims 1-7, 11-19, 22 and 23 over Ramasubramani, Barzegar and Sasamoto

In the Office Action, claims 1-7, 11-19, 22 and 23 were rejected under 35 U.S.C. §103(a) as allegedly being obvious over U.S. Patent No. 6,507,589 to Ramasubramani et al. ("Ramasubramani") in view of U.S. Patent No. 5,894,478 to Barzegar et al. ("Barzegar"), and in further view of U.S. Patent No. 6,647,264 to Sasamoto ("Sasamoto"). The Applicants respectfully traverse the rejections.

The Applicant respectfully suggests that the need to combine THREE references to find all features of the presently claimed invention is an indication of the non-obviousness of claims 1-7, 11-19, 22 and 23.

Claims 1-7, 11-19, 22 and 23 recite, *inter alia*, communication, based on a **unique combination** of a **server service type** and a **server ID**, of a mapped message between a physical client and a particular physical server supporting a message key over one or more wireless network protocols through a physical protocol gateway.

The Examiner alleges that:

One of ordinary skill in the art at the time of the invention was made would know that the external server processes of Ramasubramani (see Col. 6, ll. 33-39) can be addressed by the internal message router in the same way as the internal processes because Ramasubramani is silent as to how the external servers are addressed and the indirect message routing allows the client to transparently (and with load balancing) be directed to the proper server for the desired service. (*emphasis added; See Office Action, page 5*)

The Examiner alleges that Ramasubramani's **silence** is somehow a teaching. This is nonsensical. A reference is relied on for what it teaches, not for what it **fails to teach**. Ramasubramani **fails** to teach or suggest that his "internal message router" is capable of performing routing for a **physical client** and a **physical server**.

The Office Action alleges that “Barzegar teaches a system with a protocol gateway that establishes connections through a message router (Column 3, lines 56-58).” (See Office Action, page 5)

Barzegar teaches a “routing table 214”. However, Barzegar fails to mention what this routing table maps to allow client/server communications. Barzegar fails to teach or suggest communication, based on a unique combination of a server service type and a server ID, of a mapped message between a physical client and a particular physical server supporting a message key over one or more wireless network protocols through a physical protocol gateway, as recited by claims 1-7, 11-19, 22 and 23.

The Examiner alleges that Sasamoto teaches “a system for routing messages between gateways and message routers (Fig 1, elements 111 and 114) in which the gateway manages TCP/IP connections between the routers and the gateway, and which the router is registered within a router table of the gateway (Col. 5, lines 29-65; Col. 1, lines 14-20).” (see Office Action, page 6)

Sasamoto teaches:

At step 506, the gateway controller forwards the packet to the router that responded to the request message. More specifically, the controller 307 examines the destination address contained in the reply message, controls the routing circuit 304 and forwards the packet to the appropriate router via the routing circuit 205.

After transmission of the packet, the gateway controller proceeds to step 507 to 507 to store the destination address (DA), the source address (SA) contained in the packet and the router address (RA) in the routing table 305.

If no reply message is received within a predefined time interval, it is determined that the desired mobile station is not located in any of the location areas and the controller 307 terminates the routine.

If the destination address of the packet received from the data network 115 is found in the routing table 305, the decision at step 503 is affirmative and the controller 307 proceeds to step 508 to control the routing circuit 304 according to the routing data found in the routing table 305 and forwards the packet to the routing circuit 304 for transmission to the associated router.

If the gateway 114 has transmitted a search request message to each of the mobile routers to determine the actual location of the destination mobile station and if this mobile station is registered in the

location register of one of the routers, this router responds to the request message from the gateway with a reply message.

When the gateway 114 receives an LA-to-LA handover request message from one of the routers, the main routine of FIG. 5A is interrupted and an interrupt routine of FIG. 5B is executed, at step 510, by updating the routing table 305 with the address of the new router to which the current communication is to be handed over. At step 511, the router performs a handover operation on the mobile station so that its communication path is switched to the new base station and the previous path is cleared. The router then returns to the main routine (FIG. 5A). (see col. 5, lines 29-65)

Thus, Sasamoto teaches a gateway that includes a routing table that maps a message's "destination address" to "routing data". Communicating a mapped message based on a message's "destination address" and "routing data" is not communication, based on a unique combination of a server service type and a server ID, of a mapped message between a physical client and a particular physical server supporting a message key over one or more wireless network protocols through a physical protocol gateway, as recited by claims 1-7, 11-19, 22 and 23.

Ramasubramani's teaching modified by Berzegar and Sasamoto would at best result in Ramasubramani internally communicating a mapped message, based on a message's "destination address" and "routing data", the mapped message being communicated between a **mobile station** and a **wireless access network**. Such a modification to Ramasubramani's teachings is nonsensical and illogical since a **mobile station** and a **wireless access network** do NOT exist internal to Ramasubramani's gateway.

Ramasubramani, Berzegar, and Sasamoto, either alone or in combination, fail to disclose, teach or suggest communication, based on a unique combination of a server service type and a server ID, of a mapped message between a physical client and a particular physical server supporting a message key over one or more wireless network protocols through a physical protocol gateway, as recited by claims 1-7, 11-19, 22 and 23.

Accordingly, for at least all the above reasons, claims 1-7, 11-19, 22 and 23 are patentable over the prior art of record. It is therefore respectfully requested that the rejection be withdrawn.

Claims 8 and 20 over Ramasubramani, Barzegar, Iwama and Boyle

Claims 8 and 20 were rejected under 35 U.S.C. §103(a) as allegedly being obvious over Ramasubramani, Barzegar, and U.S. Patent No. 6,600,735 to Iwama et al. ("Iwama"), and in further view of U.S. Patent No. 6,119,167 to Boyle et al. ("Boyle"). The Applicants respectfully traverse the rejections.

Claims 8 and 20 are dependent upon claims 1 and 13 respectively, and are allowable for at least the same reasons as claims 1 and 13.

Claims 8 and 20 recite, *inter alia*, communication, based on a unique combination of a server service type and a server ID, of a mapped message between a physical client and a particular physical server supporting a message key over one or more wireless network protocols through a physical protocol gateway. As discussed above, Ramasubramani, Berzegar, and Sasamoto, either alone or in combination, fail to disclose, teach or suggest such features.

The Examiner relies on Boyle to allegedly disclose a wireless protocol gateway and http proxy that creates a TCP/IP socket connection, and managing the TCP/IP connection. (See Office Action, page 8) But, Boyle fails to mention use of a **mapped** message, much less teach or suggest communication, based on a unique combination of a server service type and a server ID, of a mapped message between a physical client and a particular physical server supporting a message key over one or more wireless network protocols through a physical protocol gateway, as recited by claims 8 and 20.

Ramasubramani, Barzegar, Sasamoto, and Boyle, either alone or in combination, fail to disclose, teach or suggest communication, based on a unique combination of a server service type and a server ID, of a mapped message between a physical client and a particular physical server supporting a

message key over one or more wireless network protocols through a physical protocol gateway, as recited by claims 8 and 20.

Accordingly, for at least all the above reasons, claims 8 and 20 are patentable over the prior art of record. It is therefore respectfully requested that the rejection be withdrawn.

Claim 9 over Ramasubramani, Barzegar, Sasamoto, and Kung

Claim 9 was rejected under 35 U.S.C. §103(a) as allegedly being obvious over Ramasubramani, Barzegar, Sasamoto, and further in view of U.S. Patent No. 6,826,173 to Kung et al. ("Kung"). The Applicants respectfully traverse the rejections.

Claim 9 is dependent upon claim 1, and is allowable for at least the same reasons as claim 1.

Claim 9 recites, *inter alia*, communication, based on a unique combination of a **server service type** and a **server ID**, of a mapped message between a physical client and a particular physical server supporting a message key over one or more wireless network protocols through a physical protocol gateway. As discussed above, Ramasubramani, Barzegar, and Sasamoto, either alone or in combination, fail to disclose, teach or suggest such features.

Kung is relied on to allegedly teach a system with multiple protocol gateways that communicate using SNMP communications. (see Office Action, page 9) But, Kung fails to mention use of a **mapped** message, much less disclose, teach or suggest communication, based on a unique combination of a **server service type** and a **server ID**, of a mapped message between a physical client and a particular physical server supporting a message key over one or more wireless network protocols through a physical protocol gateway, as recited by claim 9.

Thus, Ramasubramani, Barzegar, Sasamoto, and Kung, either alone or in combination, fail to disclose, teach or suggest communication, based on a unique combination of a **server service type** and a **server ID**, of a

mapped message between a physical client and a particular physical server supporting a message key over one or more wireless network protocols through a physical protocol gateway, as recited by claim 9.

Accordingly, for at least all the above reasons, claim 9 is patentable over the prior art of record. It is therefore respectfully requested that the rejection be withdrawn.

Claims 10 and 21 over Ramasubramani, Barzegar, Sasamoto, and Boyle2

Claims 10 and 21 were rejected under 35 U.S.C. §103(a) as allegedly being obvious over Ramasubramani, Barzegar, and Sasamoto, and further in view of U.S. Patent No. 6,138,158 to Boyle et al. ("Boyle2"). The Applicants respectfully traverse the rejections.

Claims 10 and 21 are dependent upon claims 1 and 13 respectively, and are allowable for at least the same reasons as claims 1 and 13.

Claims 10 and 21 recite, *inter alia*, communication, based on a unique combination of a server service type and a server ID, of a mapped message between a physical client and a particular physical server supporting a message key over one or more wireless network protocols through a physical protocol gateway. As discussed above, Ramasubramani, Barzegar, and Sasamoto, either alone or in combination, fail to disclose, teach or suggest such features.

Boyle2 was relied on to allegedly a maximum segment size, determining if a message exceeds the maximum segment size, and segmenting a message into a plurality of message segments, with none of the plurality of message segments exceeding the maximum segment size. (see Office Action, page 9) But, Boyle2 fails to mention use of a **mapped** message, much less disclose, teach or suggest a system and method of communicating, based on at least one of a service type and a message ID included with a message key, a mapped message between a physical client and a particular physical server supporting the message key over one or more wireless network protocols through a physical protocol gateway, as recited by claims 10 and 21.

Thus, Ramasubramani, Barzegar, Sasamoto, and Boyle2, either alone or in combination, fail to disclose, teach or suggest communication, based on a unique combination of a server service type and a server ID, of a mapped message between a physical client and a particular physical server supporting a message key over one or more wireless network protocols through a physical protocol gateway, as recited by claims 10 and 21.

Accordingly, for at least all the above reasons, claims 10 and 21 are patentable over the prior art of record. It is therefore respectfully requested that the rejection be withdrawn.

Conclusion

All objections and rejections having been addressed, it is respectfully submitted that the subject application is in condition for allowance and a Notice to that effect is earnestly solicited.

Respectfully submitted,

/William H. Bollman/

William H. Bollman
Reg. No.: 36,457
Tel. (202) 261-1020
Fax. (202) 887-0336

MANELLI SELTER PLLC
2000 M Street, N.W. 7th Floor
Washington D.C. 20036-3307
WHB/df